



SFUND RECORDS CTR

88049006

GATX TERMINALS CORPORATION

111 WEST OCEAN BOULEVARD, SUITE 1100
LONG BEACH, CA 90802-4622
213-436-0210
FAX 213-432-6519

Mr. Tom Dunkelman
U.S. Environmental Protection Agency,
Region IX
Mail Stop H-7-1
75 Hawthorne Street
San Francisco, CA 94105

March 10, 1992
Certified Mail
P-755 696 627

Return Receipt Requested

SFUND RECORDS CTR
0639-92640

Dear Mr. Dunkelman;

**SUBJECT: DEL AMO NPL SITE, LOS ANGELES, CA
GATX TERMINALS CORPORATION
CERCLA 104(e) RESPONSE**

AR2714

In a certified letter dated February 11, 1992, the U. S. Environmental Protection Agency, Region IX (EPA) notified GATX Terminals Corporation that the operation of subsurface pipelines at the southern border of the subject NPL site by several petroleum pipeline companies was potentially contributing hydrocarbons to a non-aqueous phase liquid (NAPL) floating on the groundwater located at monitoring well P1 and requested relevant information pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e).

Since GATX Terminals Corporation (GATX) owns and operates many terminals and pipelines throughout the world, we request that EPA direct all future correspondence to the GATX terminal with operating jurisdiction for the pipeline referenced in your February 11, 1992 letter. Please direct this correspondence to:

GATX Tank Storage Terminals Corporation
2000 E. Sepulveda Blvd
Carson, CA 90810-1995
P.O. BOX 9007, Long Beach, CA 90810-0007
ATTENTION:

Mr. Michael Martin
Manager of Environmental and Governmental Affairs

The following is GATX pipeline information requested relevant to the Del Amo NPL site:

1. Identify all pipelines and product transmission lines owned or operated by your company either currently or at some time in the past within a one-mile radius of the Del Amo site. This should include all pipelines identified on p. 68 and p. 69 of the most recent Los Angeles Thomas Brothers map book. For each pipeline identified provide the following information:

GATX owns and operates a single pipeline within the designated area south of the Del Amo NPL site. GATX designates this pipeline as GX-190. In order to provide clarity to this response, all subsequent information will refer to the section of GX-190 south of the Del Amo NPL site referenced in the February 11, 1992 EPA letter to GATX Terminals Corporation.

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a. Location of the pipeline (identify verbally and on a map);

GX-190 is located in the City of Torrance, California along the Del Amo Blvd Pipeline ROW as referenced in the Thomas Bros. Maps, p.68, F3, 1991 Edition.

b. Size of the pipeline;

Six inches in diameter

c. Date of construction of the pipeline;

GATX does not have any of the original construction information on the Del Amo segment of the GX-190 pipeline.

d. Type of materials transported through the pipeline (include a list of all materials, approximate volumes of all materials transported through the pipeline, approximate dates of transport of each material identified);

GATX has transported only aviation grade jet fuel (jet A).

Movements for the past two years (representative of all movement years) for which records were readily available to permit a timely response to this request for information are:

CONFIDENTIAL INFORMATION

Total movement of jet fuel in GX-190 in 1990: 3,028,375 Bbls.

Total movement of jet fuel in GX-190 in 1991: 1,939,610 Bbls.

e. Thorough discussion of the pipeline construction;

GATX did not construct any of the GX-190 pipeline at the Del Amo site.

f. Results of all pressure tests conducted on the pipeline to date;

GATX has conducted two pressure tests of the GX-190 pipeline. The first test was conducted October 25, 1985 to a test pressure of 737 pounds per square inch (psi) (1.25 X nominal operating pressure of 589 psi) .

The second pressure test was conducted on November 28, 1989, at a test of 577 psi (1.25 X nominal operating pressure of 461 psi). The next pressure test is scheduled for 1992.

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Pressure tests prior to the above dates will have to be obtained by contacting the Mobil Oil Company (owner/operator from 1942 until the late 1970's) and the Conoco Pipeline Company (owner/operator from late 1970's to 1982). GATX has owned the GX-190 pipeline since December, 1982.

g. Indicate and describe fully whether any parties have been allowed to lease or otherwise use the pipeline.

No other parties have been allowed to operate the GX-190 pipeline since the GATX owner/operatorship began in 1982.

2. Provide a complete discussion of any suspected leaks or discharges that have occurred from any pipelines identified above. In your discussion describe the following:

GATX pipeline visual inspections, operating records, and pipeline pressure tests (Question 1f above) do not indicate that leaks or discharges have occurred at the Del Amo NPL juncture of pipeline passage.

a. Cause of the leak or discharge;

NA

b. Date of the leak or discharge;

NA

c. Types and volumes of material that leaked or were discharged;

NA

d. Actions taken to remediate soil or groundwater contaminated by the leak or discharge.

NA

3. Are you aware of any pipelines, owned or operated by your company, that may have leaked, discharged, or otherwise contributed to soil or groundwater contamination in the vicinity of the Del Amo site. If so, describe fully.

GATX has no other pipelines in the near vicinity of the Del Amo site.

4. Provide a detailed discussion of the ability of your company to detect leaks or discharge from the pipelines identified above. Include in your response an estimation of the maximum volume of material that could leak or be discharged from the above identified pipelines without being detected or noticed. Include in your discussion any changes or improvements in your leak detection capabilities during the period of your operation of this pipeline.

GATX uses an ongoing operational check for product loss with each commodity movement through the GX-190 pipeline. The quantity of product pumped is measured and compared to the product recieved at the end shipment point each two hours of the shipment. All deviations from normal operating parameters are investigated immediately. Significant variations from the norm may result in shipment shutdown.

Another means of detecting petroleum commodity leakage from the GX-190 pipeline is by pressuring various segments of the pipeline to 1.25 times the nominal operating pressure for a period of time to detect any loss of pressure. This procedure for pipeline testing meets the standard required by the State of California Fire Marshalls Office.

A visual inspection of the GX-190 pipeline ROW is also conducted every two weeks by GATX employees walking the pipeline ROW route observing any irregularities.

The maximum volume of petroleum commodity leaking from a pipeline without detection has not been determined by GATX.

5. Provide a detailed discussion of the ability of your company to detect and quantify leaks or discharges from a particular segment of the pipeline as compared to the ability to detect such leaks or discharges over a significant length of pipeline.

GATX uses an ongoing operational check for product loss with each commodity movement through the GX-190 pipeline. The quantity of product pumped is measured and compared to the product recieved at the end shipment point each two hours of the shipment. All deviations from normal operating parameters are investigated immediately. Significant variations from the norm may result in shipment shutdown.

6. Are you aware of any pipeline, owned or operated by other companies, that may have leaked, discharged, or otherwise contributed to soil or groundwater contamination in the vicinity of the Del Amo site? If so, describe fully.

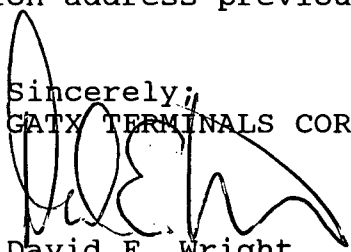
GATX is not aware of any other leaking pipelines in this vicinity.

7. Are you aware of any other companies, other than those identified in this letter, which own or operate pipelines or have owned or operated pipelines in the past in the vicinity of the Del Amo site?

GATX records of the complete history of operator/ownership of this pipeline may be incomplete. However, we are reasonably certain of two prior owner/operators of the GX-190 pipeline segment in the near vicinity of the Del Amo site. Mobil Oil Company was responsible for construction of this segment of the GX-190 pipeline and owned or operated it until the late 1970s when they apparently sold it to the Conoco Pipeline Company. Conoco owned/operated this pipeline from the late 1970s until 1982 when they sold it to GATX Tank Storage Terminals Corporation.

GATX sincerely hopes that the foregoing information on the GX-190 pipeline is relevant to your request for information on the subject NPL site. Please refer any subsequent questions or requests you may have to Mr. Michael Martin (telephone (310) 436-0210) at the GATX Tank Storage Terminals Corporation address previously provided.

Sincerely,
GATX TERMINALS CORPORATION



David E. Wright
Vice President, General Manager,
Los Angeles Petroleum Complex